

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

OMEGA PATENTS, LLC,  
a Georgia limited liability company,

Plaintiff,

v.

BAYERISCHE MOTOREN WERKE  
AG, a Foreign company, and BMW OF  
NORTH AMERICA, LLC,

Defendant.

Case No. 1:20-cv-01907-SDG

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO  
RESPOND TO COMPLAINT**

Defendant BMW of North America, LLC (“BMWNA”), hereby moves the Court to extend the time for BMWNA to answer or otherwise respond to Plaintiff Omega Patents, LLC’s (“Omega”) Complaint for a period of 60 days, through and including August 3, 2020. BMW’s current deadline for responding to the Complaint is June 4, 2020. BMWNA requests the extension because its headquarters are located in New Jersey, which is currently under a stay-at-home order due to the COVID-19 pandemic. It is unclear at present when the stay-at-home order will be

lifted.<sup>1</sup> BMWNA respectfully requests this extension to ensure a robust response to the Complaint. Omega does not oppose this motion.

A proposed order is submitted herewith.

Dated: May 20, 2020

Respectfully submitted,

*/s/ Kara A. Specht*

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<sup>1</sup> See, e.g., New Jersey Stay-at-Home Order, Executive Order No. 107 (Mar. 21, 2020) available at <https://nj.gov/infobank/eo/056murphy/pdf/EO-107.pdf> (indicating that the Order “shall remain in effect until revoked or modified by the Governor”).

**CERTIFICATE OF SERVICE**

Counsel for Defendant BMW of North America, LLC hereby certifies that on May 20, 2020 the foregoing UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT and [PROPOSED] ORDER were electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all counsel of record.

*/s/ Kara A. Specht*

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